

# Exhibit 6

(Deposition Testimony of Juan Obed Perez)

1 A. To -- if I had something pending, which I did,  
2 but it was something minor that took me half a week or  
3 so.

4 Q. So really the only notice they gave you was  
5 maybe a week?

6 A. When somebody's interviewed, there is some time  
7 in the process and the person accepts, there is  
8 another period of time in which that person would like  
9 to commence the work, and there is a gap there.

10 Q. Okay. Did you have to train them at all?

11 A. Not in that particular case.

12 Q. Okay.

13 A. It wasn't an entry level position.

14 Q. Okay. So how much time total between the time  
15 they said, "Okay, we found someone," how much time did  
16 you have after that before you had to return to  
17 Newark?

18 A. It was matter of weeks, I think. I don't  
19 recall exactly.

20 Q. More than two weeks, would you say?

21 A. About.

22 Q. And when you got back to BE&K in Newark, what  
23 did you do when you got back as far as work?

24 A. They gave me some functions of, especially in

1 relief devices, some functions that they were part of  
2 the project that I was not really directly involved in  
3 the project.

4 Q. What project was it?

5 A. I don't recall at this moment.

6 Q. Okay. So in other words, it was a project that  
7 was already ongoing and this was the kind of filler  
8 work?

9 A. Yes.

10 Q. Okay. Who was the engineer on the project at  
11 that point, do you remember?

12 A. Oh, boy. I don't recall.

13 Q. Okay. Now, as far as that kind of work, was  
14 that at your skill level or above or below your skill  
15 level?

16 A. It's on my level. Other less experienced  
17 person with the right training was able to do it.

18 Q. Okay. And any other work that you did during  
19 that time?

20 A. I don't recall. There were minor things here  
21 and there.

22 Q. Okay. More of this kind of filler work?

23 A. As far as I recall.

24 Q. Okay. Were there any more, not filler

1 projects, but real projects coming in at that time?

2 A. I think there was one.

3 Q. Okay. Do you remember anything about it?

4 A. It was, I think it was a job with, minor job  
5 with Sun Oil.

6 Q. Now, during the ones that you were doing the  
7 filler work with, was part of your time then charged  
8 to overhead like we had talked about?

9 A. No, that was charged to Tosco.

10 Q. To Tosco?

11 A. Oh, you mean --

12 Q. I mean when you came back to Newark after Tosco  
13 and you were doing the relief devices, filling in on  
14 other, taking pieces of projects, was that --

15 A. That was being charged to that particular  
16 project.

17 Q. Okay. And were you able to get a full 40-hour  
18 billable week?

19 A. While I was working for that project, yes. It  
20 could be that I ended in one day or two, so...

21 Q. Between the time you came back from Tosco and  
22 the time of the layoff, did you have 40 billable hours  
23 consistently, or was some of that time to general  
24 overhead?